

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

CONNECTION DISTRIBUTING CO.,et al.	)	CASE NO. CV 1:95CV 1993
	)	
Plaintiffs,	)	JUDGE JOHN M. MANOS
	)	
-vs-	)	
	)	
THE HONORABLE ALBERTO R. GONZALEZ,	)	<b><u>STIPULATIONS BETWEEN THE</u></b>
ATTORNEY GENERAL	)	<b><u>PARTIES REGARDING DEFENDANT'S</u></b>
	)	<b><u>EXHIBITS A - E AND PLAINTIFFS'</u></b>
	)	<b><u>REBUTTAL EXHIBITS 72 AND 74</u></b>
Defendant.	)	
	)	

On August 26, 2005, this Court ordered that Plaintiffs' counsel be permitted to depose Kristi Witsman, the declarant in the declaration contained in Defendant's Ex. A. The Court indicated that it would reserve ruling on the admission of Defendant's Exs. A - E pending review of the deposition transcript.

The parties have agreed to submit the following stipulations for consideration by the Court in lieu of the deposition of Kristi Witsman:

1. The website, [www.adultfriendfinders.com](http://www.adultfriendfinders.com), describes itself as the "World's Largest Sex and Swinger Personals Site." The website allows members of the website to post personal ads and to read ads posted by other members. A personal ad can be posted by an individual, by a couple or by a group of individuals. Members can search the personal ads posted on the website by category (e.g., "Men Seeking Women," "Women Seeking Men," "Couples Seeking Couples") and by geographical location (e.g., by state or by country). Defendant's Exs. B - E and Plaintiffs' Rebuttal Exs. 72 and 74 are printouts from that website.

2. Plaintiffs' Rebuttal Ex. 72, attached, is a print out from [www.adultfriendfinders.com](http://www.adultfriendfinders.com)

reflecting that the website contained 518,310 personal ads from Ohio on August 25, 2005. It lists these personal ads by category and reflects that 4,930 ads were posted by Ohio couples seeking men; 22,768 ads were posted by Ohio couples seeking women, and 16,085 ads were posted by Ohio couples seeking couples.

3. Plaintiffs' Rebuttal Ex. 74, attached, is a print out from [www.adultfriendfinders.com](http://www.adultfriendfinders.com) reflecting that the website contained 13,776,925 personal ads from all states in the United States on August 25, 2005. It lists these personal ads by category and reflects that 120,522 ads were posted by couples in the United States seeking men, 557,734 ads were posted by couples in the United States seeking women and 408,768 ads were posted by couples in the United States seeking couples.

4. Plaintiffs submit their rebuttal exhibits in response to the declaration of Kristi Witsman. Ms. Witsman states that she accessed [www.adultfriendfinders.com](http://www.adultfriendfinders.com) and performed various searches of that website between August 22, 2005 and August 24, 2005. Specifically, Ms. Witsman searched for (1) personal ads posted by Ohio couples of whom at least one member was between the ages of 18 and 21 seeking women; (2) personal ads posted by Ohio couples of whom at least one member was between the ages of 18 and 21 seeking men; (3) personal ads posted by Ohio couples of whom at least one member was between the ages of 18 and 21 seeking couples; (4) personal ads posted by couples in the United States of whom at least one member was between the ages of 18 and 21 seeking women; (5) personal ads posted by couples in the United States of whom at least one member was between the ages of 18 and 21 seeking men; (6) personal ads posted by couples in the United States of whom at least one member was between the ages of 18 and 21 seeking couples. Ms. Witsman's declaration does not identify the total number of ads posted by Ohio or United States couples seeking men, women, or couples. As stated above, that information is contained within Plaintiffs' Rebuttal

Exhibits 72 and 74.

5. The combination of Ms. Witsman's declaration and plaintiffs' rebuttal exhibits show that the website contained 22,768 personal ads posted by Ohio couples seeking women; 1,195 of those messages—or 5.25% of the ads posted by Ohio couples seeking women—were posted by couples, of whom at least one member was between the ages of 18 - 21. Put another way, 94.75% of those Ohio couples who posted ads seeking women were comprised of two individuals, both of whom were older than those in the 18 - 21 age category.

6. Plaintiffs reviewed each message contained in Defendant's Ex. C to derive the actual number of individuals in the category referred to in Paragraph 5 above, who were between the ages of 18 and 21 (as opposed to the number of couples who had one member between the ages of 18 and 21). That review revealed that of the 45,536 persons comprising Ohio couples placing ads seeking women, 1,834 persons—or 4.03%—were between the ages of 18 and 21. Put another way, 95.97% of the individuals comprising couples from Ohio who posted ads seeking women were older than those in the 18 - 21 age category.

7. The combination of Ms. Witsman's declaration and plaintiffs' rebuttal exhibits show that 4,930 personal ads were posted by Ohio couples seeking men, and 132 of those messages—or 2.68% of the ads posted by Ohio couples seeking men—were posted by couples of whom at least one member was between the ages of 18 and 21. Put another way, 97.32% of those Ohio couples who posted ads seeking men were comprised of two individuals, both of whom were older than those in the 18 - 21 age category.

8. Plaintiffs also reviewed each ad contained in Defendant's Ex. D to derive the actual number of individuals in the category referred to above in Paragraph 7, who were between the ages

of 18 and 21 (as opposed to the number of couples who had one member between the ages of 18 and 21). The review revealed that of the 9,860 persons comprising Ohio couples placing ads seeking men, 205 persons—or 2.08%—were between the ages of 18 and 21. Put another way, 97.92% of the individuals comprising couples from Ohio who posted ads seeking men were older than those in the 18 - 21 age category.

9. The combination of Ms. Witsman's declaration and plaintiffs' rebuttal exhibits shows that of the 16,085 personal ads posted by Ohio couples seeking couples on the website, 398 of those messages—or 2.47% of the ads posted by Ohio couples seeking couples—were posted by couples of whom at least one member was between the ages of 18 - 21. Put another way, 97.53% of those Ohio couples who posted ads seeking couples were comprised of two individuals, both of whom were older than those in the 18 -21 age category.

10. Plaintiffs also reviewed each ad contained in Defendant's Ex. E to derive the actual number of individuals in the category referred to above in Paragraph 9, who were between the ages of 18 and 21 (as opposed to the number of couples who had one member between the ages of 18 and 21). That review revealed that of the 32,170 persons comprising Ohio couples placing ads seeking couples, 600 persons—or 1.87%—were between the ages of 18 and 21. Put another way, 98.13% of the individuals comprising couples from Ohio who posted ads seeking couples were older than those in the 18 - 21 age category.

11. Defendant's exhibits contain multiple listings of the same or similar ad placed by the same couple using a different screen name. *E.g.* Exhibit C: *cf* Ad # 55 and #58; Ad # 99 and #384; Ad # 182 and #192; Ad #200 and #1067.

12. The combination of Ms. Witsman's declaration and plaintiffs' rebuttal exhibits shows

that of the 557,734 personal ads posted by couples in the United States seeking women, at least 12,500 or 2.24 percent were posted by couples containing at least one individual between the ages of 18 and 21. The total number of couples in this category is unknown because, according to Ms. Witsman, she stopped reviewing the results of the search because of the significant time involved in doing so.

13. The combination of Ms. Witsman's declaration and plaintiffs' rebuttal exhibits shows that of the 120,522 personal ads posted by couples in the United States seeking men, 3,213 or 2.67% were from couples of whom at least one member was between the ages of 18 and 21. Put another way, the percentage of personal ads posted by couples, comprised of two individuals older than those in the 18 - 21 age category, in the United States seeking men, was 97.33%.

14. The combination of Ms. Witsman's declaration and plaintiffs' rebuttal exhibits shows that of the 408,768 personal ads posted by couples in the United States seeking couples, at least 10,000 or 2.45 percent were posted by couples containing at least one individual between the ages of 18 and 21. The total number of couples in this category is unknown because, according to Ms. Witsman, she stopped reviewing the results of the search because of the significant time involved in doing so.

Respectfully submitted,

/s/ J. Michael Murray

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**CERTIFICATE OF SERVICE**

I hereby certify that on September 9, 2005, the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ J. Michael Murray

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## 518,310 Listings in Ohio

Category	Listings
<b>Men seeking ...</b>	
<a href="#">Men seeking Men</a>	17,031 Listings
<a href="#">Men seeking Women</a>	281,109 Listings
<a href="#">Men seeking Couples (man and woman)</a>	39,654 Listings
<a href="#">Men seeking Groups</a>	28,506 Listings
<a href="#">Men seeking Couples (2 women)</a>	51,922 Listings
<a href="#">Men seeking Couples (2 men)</a>	4,763 Listings
<a href="#">Men seeking TS/TV/TG</a>	4,012 Listings
<b>Women seeking ...</b>	
<a href="#">Women seeking Men</a>	22,936 Listings
<a href="#">Women seeking Women</a>	17,924 Listings
<a href="#">Women seeking Couples (man and woman)</a>	5,946 Listings
<a href="#">Women seeking Groups</a>	2,856 Listings
<a href="#">Women seeking Couples (2 women)</a>	3,986 Listings
<a href="#">Women seeking Couples (2 men)</a>	1,552 Listings
<a href="#">Women seeking TS/TV/TG</a>	240 Listings
<b>Couples (man and woman) seeking ...</b>	
<a href="#">Couples (man and woman) seeking Men</a>	4,930 Listings
<a href="#">Couples (man and woman) seeking Women</a>	22,768 Listings
<a href="#">Couples (man and woman) seeking Couples (man and woman)</a>	16,085 Listings
<a href="#">Couples (man and woman) seeking Groups</a>	4,353 Listings
<a href="#">Couples (man and woman) seeking Couples (2 women)</a>	4,171 Listings
<a href="#">Couples (man and woman) seeking Couples (2 men)</a>	663 Listings
<a href="#">Couples (man and woman) seeking TS/TV/TG</a>	266 Listings
<b>Groups seeking ...</b>	
<a href="#">Groups seeking Men</a>	61 Listings
<a href="#">Groups seeking Women</a>	181 Listings
<a href="#">Groups seeking Couples (man and woman)</a>	98 Listings
<a href="#">Groups seeking Groups</a>	160 Listings
<a href="#">Groups seeking Couples (2 women)</a>	84 Listings
<a href="#">Groups seeking Couples (2 men)</a>	19 Listings
<a href="#">Groups seeking TS/TV/TG</a>	8 Listings
<b>Couples (2 women) seeking ...</b>	
<a href="#">Couples (2 women) seeking Men</a>	90 Listings
<a href="#">Couples (2 women) seeking Women</a>	224 Listings
<a href="#">Couples (2 women) seeking Couples (man and woman)</a>	48 Listings
<a href="#">Couples (2 women) seeking Groups</a>	42 Listings
<a href="#">Couples (2 women) seeking Couples (2 women)</a>	262 Listings
<a href="#">Couples (2 women) seeking Couples (2 men)</a>	35 Listings

PLAINTIFF'S  
EXHIBIT

72

tabbles



[Couples \(2 women\) seeking TS/TV/TG](#)

5 Listings

**[Couples \(2 men\) seeking ...](#)**[Couples \(2 men\) seeking Men](#)

168 Listings

[Couples \(2 men\) seeking Women](#)

73 Listings

[Couples \(2 men\) seeking Couples \(man and woman\)](#)

35 Listings

[Couples \(2 men\) seeking Groups](#)

54 Listings

[Couples \(2 men\) seeking Couples \(2 women\)](#)

57 Listings

[Couples \(2 men\) seeking Couples \(2 men\)](#)

140 Listings

[Couples \(2 men\) seeking TS/TV/TG](#)

3 Listings

**[TS/TV/TG seeking ...](#)**[TS/TV/TG seeking Men](#)

150 Listings

[TS/TV/TG seeking Women](#)

179 Listings

[TS/TV/TG seeking Couples \(man and woman\)](#)

100 Listings

[TS/TV/TG seeking Groups](#)

60 Listings

[TS/TV/TG seeking Couples \(2 women\)](#)

89 Listings

[TS/TV/TG seeking Couples \(2 men\)](#)

64 Listings

[TS/TV/TG seeking TS/TV/TG](#)

151 Listings

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LISTINGS IN ALL STATES



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## 13,776,925 Listings in All States

Category	Listings
<b>Men seeking ...</b>	
<a href="#">Men seeking Men</a>	463,731 Listings
<a href="#">Men seeking Women</a>	6,939,951 Listings
<a href="#">Men seeking Couples (man and woman)</a>	1,063,213 Listings
<a href="#">Men seeking Groups</a>	782,657 Listings
<a href="#">Men seeking Couples (2 women)</a>	1,402,180 Listings
<a href="#">Men seeking Couples (2 men)</a>	127,935 Listings
<a href="#">Men seeking TS/TV/TG</a>	109,098 Listings
<b>Women seeking ...</b>	
<a href="#">Women seeking Men</a>	599,088 Listings
<a href="#">Women seeking Women</a>	471,678 Listings
<a href="#">Women seeking Couples (man and woman)</a>	162,776 Listings
<a href="#">Women seeking Groups</a>	82,512 Listings
<a href="#">Women seeking Couples (2 women)</a>	107,517 Listings
<a href="#">Women seeking Couples (2 men)</a>	41,773 Listings
<a href="#">Women seeking TS/TV/TG</a>	6,556 Listings
<b>Couples (man and woman) seeking ...</b>	
<a href="#">Couples (man and woman) seeking Men</a>	120,522 Listings
<a href="#">Couples (man and woman) seeking Women</a>	557,734 Listings
<a href="#">Couples (man and woman) seeking Couples (man and woman)</a>	408,768 Listings
<a href="#">Couples (man and woman) seeking Groups</a>	121,091 Listings
<a href="#">Couples (man and woman) seeking Couples (2 women)</a>	110,610 Listings
<a href="#">Couples (man and woman) seeking Couples (2 men)</a>	16,029 Listings
<a href="#">Couples (man and woman) seeking TS/TV/TG</a>	7,411 Listings
<b>Groups seeking ...</b>	
<a href="#">Groups seeking Men</a>	1,610 Listings
<a href="#">Groups seeking Women</a>	5,244 Listings
<a href="#">Groups seeking Couples (man and woman)</a>	2,803 Listings
<a href="#">Groups seeking Groups</a>	4,680 Listings
<a href="#">Groups seeking Couples (2 women)</a>	2,488 Listings
<a href="#">Groups seeking Couples (2 men)</a>	650 Listings
<a href="#">Groups seeking TS/TV/TG</a>	276 Listings
<b>Couples (2 women) seeking ...</b>	
<a href="#">Couples (2 women) seeking Men</a>	2,381 Listings
<a href="#">Couples (2 women) seeking Women</a>	5,866 Listings
<a href="#">Couples (2 women) seeking Couples (man and woman)</a>	1,517 Listings
<a href="#">Couples (2 women) seeking Groups</a>	1,402 Listings
<a href="#">Couples (2 women) seeking Couples (2 women)</a>	6,609 Listings
<a href="#">Couples (2 women) seeking Couples (2 men)</a>	1,207 Listings
<a href="#">Couples (2 women) seeking TS/TV/TG</a>	197 Listings



**Couples (2 men) seeking ...**

<a href="#">Couples (2 men) seeking Men</a>	5,011 Listings
<a href="#">Couples (2 men) seeking Women</a>	2,101 Listings
<a href="#">Couples (2 men) seeking Couples (man and woman)</a>	1,027 Listings
<a href="#">Couples (2 men) seeking Groups</a>	1,536 Listings
<a href="#">Couples (2 men) seeking Couples (2 women)</a>	1,488 Listings
<a href="#">Couples (2 men) seeking Couples (2 men)</a>	4,201 Listings
<a href="#">Couples (2 men) seeking TS/TV/TG</a>	141 Listings

**TS/TV/TG seeking ...**

<a href="#">TS/TV/TG seeking Men</a>	4,313 Listings
<a href="#">TS/TV/TG seeking Women</a>	4,317 Listings
<a href="#">TS/TV/TG seeking Couples (man and woman)</a>	2,740 Listings
<a href="#">TS/TV/TG seeking Groups</a>	1,709 Listings
<a href="#">TS/TV/TG seeking Couples (2 women)</a>	2,231 Listings
<a href="#">TS/TV/TG seeking Couples (2 men)</a>	1,806 Listings
<a href="#">TS/TV/TG seeking TS/TV/TG</a>	4,544 Listings

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